



February 11, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: United States Cellular Corporation ("U.S. Cellular")

Modernizing the Form 477 Data Program, WC Docket No. 11-10, Notice of Proposed Rulemaking, 26 FCC Rcd 1508 (2011).

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, U.S. Cellular hereby provides you with notice of an oral ex parte discussion in connection with the above-captioned proceeding. On February 8, 2013, Bill Tortoriello, Manager - Regulatory Affairs, and Jim Wright, GIS Technician, of U.S. Cellular along with the undersigned, conferenced via telephone with members of the Commission Staff including Susan Singer (WTB), Tom Peters (WTB), Nese Guendelsberger (WTB), Eliot Maenner (WTB), Michael Jansen (WTB), Mitali Shah (WTB), Travis Litman (WCB), Chelsea Fallon (WCB), Ellen Burton (WCB), and Kenneth Lynch (WCB).

During the course of the conference, U.S. Cellular further learned about the Commission staff's proposed revisions to its Form 477 data collection practices, including the possible incorporation of the Commission acting as a single point of collection for NTIA broadband data. Any combined NTIA/ Form 477 filing would be mandatory under FCC rules. Specifically, the staff discussed its desire to utilize shape-files from carriers by technology/ spectrum band/ advertised speeds and asked about the practicality of U.S. Cellular producing such files. U.S. Cellular indicated that it houses this level of data and can potentially support those types of shape files. Customers would be reported at the highest speed capable for their device (i.e., if a customer has a device that is both 4G and 3G capable, he/she would only be reported at the higher level, 4G tier). We discussed prepaid customer counts and how they can be affected as these customers are generally listed by a

store's point of sale address, which does not coincide with the customer's home or actual use address.

Staff further asked if there was any other information U.S. Cellular collected about customer devices such as operating system or screen size. We indicated that we are in the middle of a billing system conversion and have not had an opportunity to preview the new system nor the level of information that the billing platform will capture.

Lastly, the staff inquired about machine to machine served customers and our ability to report about this type of connection. We indicated that the Company does not currently actively serve that segment of the market. .

Sincerely,

/S/

Grant B Spellmeyer, Esq.
Executive Director – Federal Affairs & Public Policy